



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer's Direct Dial: (212) 416-6696

BY ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

March 5, 2021

MEMORANDUM ENDORSEMENT

Re: Valverde v. Folks, et al, 19 Civ. 08080 (MKV)

Dear Judge Gorenstein:

Pursuant to the Court's February 1, 2021 Order, scheduling a settlement conference in this matter for March 12, 2021, and Your Honor's Standing Order Applicable to Telephonic Settlement Conferences (ECF Doc. No. 101) the parties respectfully request an adjournment of the settlement conference sine die. The parties submit that this adjournment will allow time for the parties to complete necessary discovery and to review other information that will make the conference more fruitful. Specifically, the parties are seeking to resolve an outstanding discovery matter over the terms of a confidentiality stipulation proposed by Defendants in order to produce certain confidential information. Once this discovery matter is resolved, the parties can proceed with the completion of fact discovery, which is due March 24, 2021. See ECF Doc. No. 97. Additional time will also permit Defendants' counsel to adequately evaluate Plaintiff's demand, which was recently received, and to determine whether settlement in the case is warranted, and if so, to seek the appropriate settlement authority. Accordingly, the parties respectfully request that the settlement conference scheduled for March 12, 2021 be adjourned 45-60 days after the close of fact discovery.

Respectfully submitted,

s/ Sofia Connie Aranda

Sofia Connie Aranda
Counsel for Plaintiff

s/ Jonathan J. Wilson

Jonathan J. Wilson
Assistant Attorney General
*Counsel for Defendants Folks,
Cunningham, Brown, Gonzalez,
Orrico, and Mayes*

s/ Anthony Michael DeFazio

Anthony Michael DeFazio
Counsel for Defendant Frangella

MEMORANDUM ENDORSEMENT

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Settlement conference adjourned sine die. As soon as the parties are prepared to proceed with a settlement conference, they shall file a letter to the Court with proposals for dates for a rescheduled conference.

So Ordered.



CABRIEL W. CORENSTEIN
United States Magistrate Judge
March 5, 2021